INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
*We make Indiana a cleaner, healthier place to live.*

*Frank O'Bannon*
Governor

*Lori F. Kaplan*
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

May 29, 2003

TO: Interested Parties / Applicant

RE: **ATTC MANUFACTURING 123-16598-00023**

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

## Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for consideration at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

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**May 29, 2003**

Mr. Masaaki Takeuchi
ATTC Manufacturing, Inc.
10455 State Road 37
Tell City, Indiana 47586

Re: 123-16598-00023
First Significant Permit Revision to
MSOP 123-14584-00023

Dear Mr. Takeuchi:

ATTC Manufacturing, Inc., was issued a minor source operating permit on November 16, 2001 for a metal auto parts manufacturing plant. A letter requesting a revision to this permit was received on December 17, 2002. Pursuant to the provisions of 326 IAC 2-6.1-6, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

This modification consists of the following:

(a) Construction of the following new emission units:

(1) Two (2) air atomizing painting lines, identified as PL2 and PL3, each with a maximum process rate of 72 parts per hour and a maximum paint usage of 0.095 gallons per unit, each equipped with a 0.8 MMBtu/hr natural gas-fired oven, using water curtain as control, venting through stacks S19 and S20, respectively.

(2) One (1) touch-up spray booth, identified as TUPB, with a maximum process rate of 54.1 parts per hour and a maximum paint usage of 0.0032 gallons per unit.

(3) Five (5) metal dry milling lines, identified as DR-0, DR-6, DI-F0, DI-F9, and DI-F10, each with a maximum capacity of 1,300 pounds of parts per hour, each equipped with a dust collector for control.

(4) Two (2) parts washing stations, identified as PW1 and PW2, each with a maximum solvent usage of 36.5 gallons per year.

(5) One (1) natural gas-fired space heater, with a maximum heat capacity of 0.2 MMBtu/hr.

(6) Wet milling operations, where an aqueous cutting coolant continuously floods the machining interface.

(b) Modification of the existing airless spray painting line PL1 with conventional air atomizing guns and changing the coatings applied in this painting line.

(c) Renaming the existing sixteen (16) cast metal milling lines from EU1 through EU16 to DR-1 through DR-5, DR-7, DI-F1 through DI-F8, DI-R1, and DI-R2.

The following construction conditions are applicable to the proposed project:

1. The data and information supplied with the application shall be considered part of this permit revision approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Pursuant to IC 13-15-5-3, this approval to construct becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-6.1-6, the minor source operating permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised permit.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Yu-Lien Chu, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7871 to speak directly to Ms. Chu. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,
**Original signed by**
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

ERG/YC

cc: File - Perry County
Perry County Health Department
Southwest Regional Office
Air Compliance Section Inspector - Scott Anslinger
Compliance Data Section - Karen Nowak
Administrative and Development - Sara Cloe
Technical Support and Modeling - Michele Boner

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# NEW SOURCE CONSTRUCTION PERMIT and MINOR SOURCE OPERATING PERMIT

# OFFICE OF AIR QUALITY

## ATTC Manufacturing, Inc.
## 10455 State Road 37
## Tell City, Indiana 47586

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

| | |
|---|---|
| Operation Permit No.: MSOP 123-14584-00023 | |
| Issued by:<br>Paul Dubenetzky, Branch Chief<br>Office of Air Quality | Issuance Date: November 6, 2001<br><br>Expiration Date: November 6, 2006 |

| | |
|---|---|
| First Significant Permit Revision No.:<br>123-16598-00023 | Affected Pages: 4, 5, 11, 12, 16-23, 27-32 |
| Issued by: **Original signed by**<br>Paul Dubenetzky, Branch Chief<br>Office of Air Quality | Issuance Date: **May 29, 2003** |

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## TABLE OF CONTENTS

**TABLE OF CONTENTS (Continued)**

## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary metal automotive parts manufacturing facility.

| | |
|---|---|
| Authorized Individual: | President |
| Source Address: | 10455 State Road 37, Tell City, Indiana 47586 |
| Mailing Address: | 10455 State Road 37, Tell City, Indiana 47586 |
| General Source Phone Number: | (812) 547-5060 |
| SIC Code: | 3714 |
| County Location: | Perry |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Minor Source Operating Permit<br>Minor Source, under PSD<br>Major Source, Section 112 of the Clean Air Act<br>Not 1 of 28 Source Categories |

### A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

(a) Sixteen (16) metal dry milling lines, identified as DR-1 through DR-5, DR-7, DI-F1 through DI-F8, DI-R1, and DI-R2, each with a maximum capacity of 1,300 pounds per hour. Each of the metal dry milling lines is controlled by a dust collector.

(b) Five (5) metal dry milling lines, identified as DR-0, DR-6, DI-F0, DI-F9, and DI-F10, each with a maximum capacity of 1,300 pounds of parts per hour, each equipped with a dust collector for control.

(c) One (1) automated painting line, identified as PL1, constructed in 2001 and modified in 2002, using HVLP spray application, consisting of an aqueous wash step, an automated spray painting enclosure, a natural gas-fired drying oven with a maximum heat input of 0.8 million Btu per hour, a final forced-draft cooling step, and vents through stack S18.

(d) Two (2) automated painting lines, identified as PL2 and PL3, using conventional air atomizing spray application, each equipped with a 0.8 MMBtu/hr natural gas-fired oven, using dry filters as control, venting through stacks S19 and S20, respectively.

(e) One (1) touch-up spray booth, identified as TUPB, with a maximum paint usage less than 5 gallons per day.

(f) Two (2) parts washing stations, identified as PW1 and PW2, each with a maximum solvent usage of 36.5 gallons per year.

(g) Three (3) natural gas-fired furnaces for building heat, each with a maximum heat input capacity of 0.4 million Btu per hour.

(h) One (1) natural gas-fired furnace for building heat, with a maximum heat input capacity of 0.25 million Btu per hour.

(i) Two (2) natural gas-fired space heaters with a maximum heat input capacity of 0.15 million Btu per hour.

(j) One (1) natural gas-fired space heat with a maximum heat input capacity of 0.2 million Btu per hour.

(k) One (1) natural gas-fired space heater, with a maximum heat capacity of 0.2 MMBtu/hr.

(l) Metal wet milling operations, where an aqueous cutting coolant continuously floods the machining interface.

## SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

### B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

### B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

### B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

### B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### B.5 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled “Minor Source Operating Permit”, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

### B.6 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.

(1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

(2) If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section prior to beginning operation of the facilities.

(b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.

(d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

(e) Pursuant to 326 IAC 2-7-4(a)(1)(A)(ii) and 325 IAC 2-5.1-4, the Permittee shall apply for a Part 70 operating permit within twelve (12) months of the date on which the source first meets an applicability criterion of 326 IAC 2-7-2.

B.7 Permit Term [326 IAC 2-6.1-7]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications or amendments of this permit do not affect the expiration

## SECTION C SOURCE OPERATION CONDITIONS

### Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

(a) The total source potential to emit of all criteria pollutants is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

(d) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.7 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.8 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.9 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

**Testing Requirements**

C.10 Performance Testing [326 IAC 3-6]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

**Compliance Monitoring Requirements**

C.11 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.13 Compliance Response Plan - Preparation and Implementation

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan under 40 CFR 60/63 , such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan to include such response steps taken.

The OMM Plan shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM,

OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

**Record Keeping and Reporting Requirements**

C.15 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality(OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.16 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.17 General Record Keeping Requirements [326 IAC 2-6.1-2]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.19 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

**Facility Description [326 IAC 2-6.1]**

(a) Sixteen (16) metal dry milling lines, identified as DR-1 through DR-5, DR-7, DI-F1 through DI-F8, DI-R1, and DI-R2, each with a maximum capacity of 1,300 pounds per hour. Each of the metal dry milling lines is controlled by a dust collector.

(b) Five (5) metal dry milling lines, identified as DR-0, DR-6, DI-F0, DI-F9, and DI-F10, each with a maximum capacity of 1,300 pounds of parts per hour, each equipped with a dust collector for control.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards**

D.1.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 ( Manufacturing Processes), the allowable particulate emission rate from each of the milling lines shall not exceed 3.1 pounds per hour when operating at a process weight rate of 1,300 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

**Compliance Determination Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]**

D.1.2 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.3 Particulate Control

The dust collectors for PM control shall be in operation at all times when the milling lines are in operation.

**SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS**

**Facility Description [326 IAC 2-6.1]**

(c) One (1) automated painting line, identified as PL1, constructed in 2001 and modified in 2002, using HVLP spray application, consisting of an aqueous wash step, an automated spray painting enclosure, a natural gas-fired drying oven with a maximum heat input of 0.8 million Btu per hour, a final forced-draft cooling step, and vents through stack S18.

(d) Two (2) automated painting lines, identified as PL2 and PL3, using conventional air atomizing spray application, each equipped with a 0.8 MMBtu/hr natural gas-fired oven, using dry filters as control, venting through stacks S19 and S20, respectively.

(e) One (1) touch-up spray booth, identified as TUPB, with a maximum paint usage less than 5 gallons per day.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards**

D.2.1 New Source Toxics Control [326 IAC 2-4.1-1]

Pursuant to 326 IAC 2-4.1-1 (MACT):

(a) The amount of any single HAP delivered to each of the painting lines (PL1, PL2, and PL3) plus the amount of any single HAP used for clean-up for each line shall not exceed 10.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The amount of any combination of HAPs delivered to each of the painting lines (PL1, PL2, and PL3) plus the amount of any combination of HAPs used for clean-up for each line shall not exceed 25.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Therefore, the requirements of 326 IAC 2-4.1-1 (MACT) are not applicable to these painting lines.

D.2.2 Volatile Organic Compounds [326 IAC 8-2-9]

(a) For each of the painting lines PL1, PL2, and PL3:

(1) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of three and five tenths (3.5) that applies extreme performance coatings pounds of VOC per gallon of coating excluding water, delivered to a coating applicator.

(2) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(b) Actual VOC emissions before add-on control from the touch-up spray booth (TUPB) are less than 15 pounds per day. Therefore, 326 IAC 8-2-9 will not apply to this touch-up spray booth. Any change or modification which may increase the actual emissions before add-on control to 15 pounds per day or more of volatile organic compounds must be approved by the Office of Air Quality before any such change may occur.

D.2.3 Particulate [326 IAC 6-3-2 (d)][326 IAC 2-2]

(a) Particulate from the painting lines PL1, PL2, and PL3 shall be controlled by water curtains, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

(b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

(1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

The use of water curtains with the painting lines effectively limits the PM emissions from the entire source to less than 250 tons/yr. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

D.2.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for this emissions unit and any control devices.

**Compliance Determination Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

D.2.5 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test these emissions units by this permit. However, IDEM may require compliance testing when necessary to determine if these emissions units are in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.6 Hazardous Air Pollutants (HAP) and Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the HAP usage limitations in D.2.1 and the VOC content limitations in Conditions D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAPs data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]**

D.2.7 Monitoring

(a) Daily inspections shall be performed for painting line PL1 to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify the placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stack S18 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Preparation and Implementation, shall be considered a violation of this permit.

(b) Daily inspections shall be performed for painting lines PL2 and PL3 to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S19 and S20) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Preparation, Implementation, Records, and Reports in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a violation of this permit.

(c) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Preparation and Implementation, shall be considered a violation of this permit.

(d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]**

D.2.8 Record Keeping Requirements

(a) To document compliance with Condition D.2.7 the Permittee shall maintain a log of weekly overspray observations, weekly observations of the water level in the pans, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(b) To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP emission limits established in Conditions D.2.1 and D.2.2.

(1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets

(MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The cleanup solvent usage for each month;

(3) The total VOC and HAP usage for each month; and

(4) The weight of VOCs and HAPs emitted for each compliance period.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter period being reported. The report submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

**SECTION D.3 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-6.1]:**

(f) Two (2) parts washing stations, identified as PW1 and PW2, each with a maximum solvent usage of 36.5 gallons per year.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards [326 IAC 2-6.1]**

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements; and

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), or cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), then the drainage facility must be internal such that articles are enclosed under the

cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38$^{O}$C) (one hundred degrees Fahrenheit (100$^{O}$F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9$^{O}$C) (one hundred twenty degrees Fahrenheit (120$^{O}$F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS**

**Facility Description [326 IAC 2-6.1]**

(g) Three (3) natural gas-fired furnaces for building heat, each with a maximum heat input capacity of 0.4 million Btu per hour.

(h) One (1) natural gas-fired furnace for building heat, with a maximum heat input capacity of 0.25 million Btu per hour.

(i) Two (2) natural gas-fired space heaters with a maximum heat input capacity of 0.15 million Btu per hour.

(j) One (1) natural gas-fired space heat with a maximum heat input capacity of 0.2 million Btu per hour.

(k) One (1) natural gas-fired space heater, with a maximum heat capacity of 0.2 MMBtu/hr.

(l) Metal wet milling operations, where an aqueous cutting coolant continuously floods the machining interface.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

There are no specifically applicable rules or requirements for this unit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**
**OFFICE OF AIR QUALITY**
**Compliance Branch**

**MINOR SOURCE OPERATING PERMIT**
**ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

| | |
|---|---|
| **Company Name:** | ATTC Manufacturing, Inc**.** |
| **Address:** | 10455 State Road 37 |
| **City:** | Tell City, IN 47586 |
| **Phone #:** | (812) 547-5060 |
| **MSOP #:** | 123-14584-00023 |

I hereby certify that ATTC Manufacturing, Inc. is
**9** still in operation.
**9** no longer in operation.

I hereby certify that ATTC Manufacturing, Inc. is
**9** in compliance with the requirements of MSOP 123-14584-00023.
**9** not in compliance with the requirements of MSOP 123-14584-00023.

| |
|---|
| **Authorized Individual (typed):** |
| **Title:** |
| **Signature:** |
| **Date:** |

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

| |
|---|
| **Noncompliance:** |
| |
| |
| |
| |

## MALFUNCTION REPORT

### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
### OFFICE OF AIR QUALITY
**FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____
LOCATION: (CITY AND COUNTY)_____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP:_____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
*SEE PAGE 2

**Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.**

**326 IAC 1-6-1 Applicability of rule**

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

**326 IAC 1-2-39 "Malfunction" definition**

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____

_____

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY
# COMPLIANCE DATA SECTION

## MSOP Quarterly Report

Source Name: ATTC Manufacturing, Inc.
Source Address: 10455 State Road 37, Tell City, Indiana 47586
Mailing Address: 10455 State Road 37, Tell City, Indiana 47586
SPR No.: 123-16598-00023
Facility: Painting Line PL1
Parameter: A single HAP usage
Limit: Less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---|---|---|---|
| | This Month | Previous 11 Months | 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

**9** No deviation occurred in this quarter.

**9** Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY
# COMPLIANCE DATA SECTION

## MSOP Quarterly Report

Source Name: ATTC Manufacturing, Inc.
Source Address: 10455 State Road 37, Tell City, Indiana 47586
Mailing Address: 10455 State Road 37, Tell City, Indiana 47586
SPR No.: 123-16598-00023
Facility: Painting Line PL1
Parameter: Total HAP usage
Limit: Less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---|---|---|---|
| | This Month | Previous 11 Months | 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

**9** No deviation occurred in this quarter.

**9** Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY
# COMPLIANCE DATA SECTION

## MSOP Quarterly Report

Source Name: ATTC Manufacturing, Inc.
Source Address: 10455 State Road 37, Tell City, Indiana 47586
Mailing Address: 10455 State Road 37, Tell City, Indiana 47586
SPR No.: 123-16598-00023
Facility: Painting Line PL2
Parameter: A single HAP usage
Limit: Less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---|---|---|---|
| | This Month | Previous 11 Months | 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

**9** No deviation occurred in this quarter.

**9** Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY
# COMPLIANCE DATA SECTION

## MSOP Quarterly Report

Source Name: ATTC Manufacturing, Inc.
Source Address: 10455 State Road 37, Tell City, Indiana 47586
Mailing Address: 10455 State Road 37, Tell City, Indiana 47586
SPR No.: 123-16598-00023
Facility: Painting Line PL2
Parameter: Total HAP usage
Limit: Less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---|---|---|---|
| | This Month | Previous 11 Months | 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

**9** No deviation occurred in this quarter.

**9** Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY
# COMPLIANCE DATA SECTION

## MSOP Quarterly Report

Source Name: ATTC Manufacturing, Inc.
Source Address: 10455 State Road 37, Tell City, Indiana 47586
Mailing Address: 10455 State Road 37, Tell City, Indiana 47586
SPR No.: 123-16598-00023
Facility: Painting Line PL3
Parameter: A single HAP usage
Limit: Less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---|---|---|---|
| | This Month | Previous 11 Months | 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

**9** No deviation occurred in this quarter.

**9** Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY
# COMPLIANCE DATA SECTION

## MSOP Quarterly Report

Source Name: ATTC Manufacturing, Inc.
Source Address: 10455 State Road 37, Tell City, Indiana 47586
Mailing Address: 10455 State Road 37, Tell City, Indiana 47586
SPR No.: 123-16598-00023
Facility: Painting Line PL3
Parameter: Total HAP usage
Limit: Less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---|---|---|---|
| | This Month | Previous 11 Months | 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

**9** No deviation occurred in this quarter.

**9** Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

# May 29, 2003
# Indiana Department of Environmental Management
# Office of Air Quality

## Technical Support Document (TSD) for a Significant Permit Revision to a Minor Source Operating Permit

**Source Background and Description**

| | |
|---|---|
| Source Name: | ATTC Manufacturing, Inc. |
| Source Location: | 10455 State Road 37, Tell City, Indiana 47586 |
| County: | Perry |
| SIC Code: | 3714 |
| Operation Permit No.: | 123-14584-00023 |
| Operation Permit Issuance Date: | November 16, 2001 |
| Significant Permit Revision No.: | 123-16598-00023 |
| Permit Reviewer: | ERG/YC |

**History**

On January December 17, 2002, ATTC Manufacturing, Inc. submitted a permit revision application to the OAQ requesting the following:

(a) The permission to construct the following new emission units:

(1) Two (2) automated painting lines, identified as PL2 and PL3, using conventional air atomizing spray application, each with a maximum process rate of 72 parts per hour and a maximum paint usage of 0.095 gallons per unit, each equipped with a 0.8 MMBtu/hr natural gas-fired oven, using water curtain as control, venting through stacks S19 and S20, respectively.

(2) One (1) touch-up spray booth, identified as TUPB, with a maximum process rate of 54.1 parts per hour and a maximum paint usage of 0.0032 gallons per unit.

(3) Five (5) metal dry milling lines, identified as DR-0, DR-6, DI-F0, DI-F9, and DI-F10, each with a maximum capacity of 1,300 pounds of parts per hour, each equipped with a dust collector for control.

(4) Two (2) parts washing stations, identified as PW1 and PW2, each with a maximum solvent usage of 36.5 gallons per year.

(5) One (1) natural gas-fired space heater, with a maximum heat capacity of 0.2 MMBtu/hr.

(6) Metal wet milling operations, where an aqueous cutting coolant continuously floods the machining interface.

(b) To use the high HAP content coatings in existing painting line PL1. The source stated that the existing airless spray guns of this line were replaced with conventional air atomizing guns in June, 2002. This replacement decreases the transfer efficiency of this line from 40% to 30%, and increases the actual particulate emissions.

(c) To rename the existing sixteen (16) cast metal milling lines from EU1 through EU16 to DR-1 through DR-5, DR-7, DI-F1 through DI-F8, DI-R1, and DI-R2. In addition, the source indicated that these milling lines should be referred to as "metal dry milling lines".

ATTC Manufacturing, Inc. was issued a MSOP (#123-14585-00023) on November 16, 2001. Note that the replacement of the different type spray guns for painting line PL1 is considered a modification to the existing painting line because the actual PM and PM10 emissions increased after this replacement. Pursuant to 326 IAC 2-6.1-6, the source should have applied for a permit revision before this replacement.

**Unpermitted Emission Units and Pollution Control Equipment**

The source consists of the following unpermitted facilities/units:

(a) One (1) automated atomizing spray painting line, identified as PL1, constructed in 2001 and modified in 2002, consisting of an aqueous wash step, an automated spray painting enclosure, a natural gas-fired drying oven with a maximum heat input of 0.8 million Btu per hour, and a final forced-draft cooling step. The automated airless spray painting line has a maximum capacity of 72 units of parts per hour and 0.095 gallons of paint per unit, and vents through S18.

**Existing Approvals**

The source has been operating under previous approvals including, but not limited to, the following:

(a) MSOP 123-14584-00023 issued on November 16, 2001.

All conditions from previous approvals were incorporated into this permit.

**Enforcement Issue**

(a) IDEM is aware that equipment has been operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled Unpermitted Emission Units and Pollution Control Equipment.

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

**Recommendation**

The staff recommends to the Commissioner that the MSOP Significant Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on December 17, 2002 with additional information received on February 24, 2003, and March 5, 2003.

**Emission Calculations**

See Appendix A of this document for detailed emissions calculations (pages 1 through 8).

**Potential To Emit of Revision Before Controls**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

| Pollutant | Potential To Emit (tons/year) |
|---|---|
| PM | 266.7 |
| PM-10 | 266.7 |
| $SO_2$ | Negligible |
| VOC | 187.8 |
| CO | 0.07 |
| $NO_x$ | 0.09 |

| HAP's | Potential To Emit (tons/year) |
|---|---|
| Glycol Ether | 129.9 |
| TOTAL | 129.9 |

**Justification for Revision**

This revision is being performed through a MSOP Significant Permit Revision pursuant to 326 IAC 2-6.1-6(i)(1)(B) because this modification results in the source needing to obtain a Part 70 permit.

**County Attainment Status**

The source is located in Perry County.

| Pollutant | Status |
|---|---|
| PM-10 | Attainment |
| $SO_2$ | Attainment |
| $NO_2$ | Attainment |
| Ozone | Attainment |
| CO | Attainment |
| Lead | Attainment |

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Perry County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Perry County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

**Source Status**

Existing Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

| Pollutant | Emissions (ton/yr) |
|---|---|
| PM | 38.1 |
| PM10 | 38.1 |
| $SO_2$ | -- |
| VOC | 1.6 |
| CO | -- |
| $NO_x$ | 0.5 |

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

(b) These emissions were based on the Technical Support Document (TSD) for MSOP #123-14584-00023, issued on November 16, 2001.

**Part 70 Permit Determination**

326 IAC 2-7 (Part 70 Permit Program)
This existing source, including the emissions from this permit SPR #123-16598-00023, will be subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) a single hazardous air pollutant (HAP) will be greater than 10 tons per year, and

(b) any combination of HAPs will be greater than 25 tons/year.

This status is based on all the air approvals issued to the source. This existing source shall apply for a Part 70 (Title V) operating permit within twelve (12) months after this source becomes subject to Title V.

**Federal Rule Applicability**

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) The source does not perform surface coating operations to metal furniture. Therefore, the New Source Performance Standards for Surface Coating of Metal Furniture (40 CFR Part 60.310 - 60.316, Subpart EE) are not applicable.

(c) This source is this is not an automobile assembly plant. Therefore, the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations (40 CFR 60.390 - 60.398, Subpart MM) are not applicable to this source.

(d) The source does not perform metal coil surface coating operations. Therefore, the New Source Performance Standards for Metal Coil Surface Coating (40 CFR Part 60.460 - 60.466, Subpart TT) are not applicable.

(e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this source.

(f) The solvents used in the parts washing stations contain less than 5% by weight of halogenated HAPs specified in 40 CFR 63.460. Therefore, the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning (40 CFR Part 63.460 - 63.470, Subpart T) are not applicable to this source.

**State Rule Applicability - Entire Source**

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source was constructed in 2001 and modified in 2003 (this permit revision). This source is not in 1 of 28 source categories defined in 326 IAC 2-2-1(p)(1). When this source was constructed in 2001, the potential to emit each criteria pollutant from the entire source was less than 250 tons/yr before control. After this modification, the potential to emit PM and PM10 from the entire source will be greater than 250 tons/yr before control. The use of water curtains with the painting lines will effectively limit the PM and PM10 emissions to less than 250 tons/yr. Therefore, the requirements of 326 IAC 2-2 are not applicable.

326 IAC 2-4.1 (New Sources of Hazardous Air Pollutants)

This source was constructed in 2001 and modified in 2003 (this permit revision). The potential to emit HAP from the entire source before this revision was less than 10 tons/yr for a single HAP and less than 25 tons/yr for any combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 were not applicable when this source was constructed.

After this revision, the existing painting line PL1 will use high HAP content coatings and will have potential to emit HAPs greater than 10 tons/yr for a single HAP and 25 tons/yr for total HAPs. Each of the proposed new painting lines (PL2 and PL3) also has potential to emit HAPs greater than the HAP major source thresholds.

Since these three (3) painting lines (PL1, PL2, and PL3) will operate independently and will not be in series, the source proposed the following limits:

(a) The amount of any single HAP delivered to each of the painting lines (PL1, PL2, and PL3) plus the amount of any single HAP used for clean-up for each line shall not exceed 10.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The amount of any combination of HAPs delivered to each of the painting lines (PL1, PL2, and PL3) plus the amount of any combination of HAPs used for clean-up for each line shall not exceed 25.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Therefore, the requirements of 326 IAC 2-4.1(MACT) are not applicable to these painting lines.

326 IAC 2-6 (Emission Reporting)

This source will be subject to 326 IAC 2-6 (Emission Reporting), because the potential to emit VOC will be more than one hundred (100) tons per year after this revision. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity), opacity shall meet the following conditions unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**State Rule Applicability - Painting Lines PL1, PL2, PL3**

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

These three (3) painting lines (PL1, PL2, and PL3) perform metal coating and the source is under the Standard Industrial Classification Code of major group #37. Therefore, the VOC content of the coatings applied to this facility shall be limited as follows:

(a) Three and five tenths (3.5) pounds VOC per gallon of coating, excluding water, delivered to the applicators that apply extreme performance coatings.

(b) Solvent sprayed from the application equipment during clean-up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is completed, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the Permittee, the VOC content of the coating delivered to these painting lines (PL1, PL2, and PL3) is in compliance with the requirements above.

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

The potential VOC emissions from each painting line is greater than 25 tons per year. Since the requirements of 326 IAC 8-2-9 apply to these lines, the requirements of 326 IAC 8-1-6 are not applicable.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

Each painting line uses more than 5 gallons per day of coatings. Pursuant to 326 IAC 6-3-2(d), particulate from the painting lines PL1, PL2, and PL3 shall be controlled by water curtains, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

**State Rule Applicability - Touch-up Spray Booth (TUPB)**

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

The actual VOC emissions from this touch-up spray booth are less than 15 pounds per day. Pursuant to 326 IAC 8-2-1(a)(4), this unit is exempt from the requirements of 326 IAC 8-2.

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

The touch-up spray booth was constructed after January 1, 1980 and has potential VOC emissions less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable. Any change or modification which may increase the potential VOC emissions from the spray booth TUPB to greater than twenty-five (25) tons per year must be approved by the Office of Air Quality before any such change may occur.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

This touch-up spray booth uses less than 5 gallons per day of coatings. Pursuant to 326 IAC 6-3-1(b)(15), this unit is exempt for the requirements of 326 IAC 6-3.

**State Rule Applicability - Five (5) Metal Dry Milling Lines (DR-0, DR-6, DI-F0, DI-F9, and DI-F10)**

326 IAC 6-3-2 (Manufacturing Processes)

The allowable particulate emissions from each of the metal milling lines shall not exceed 3.1 pounds per hour when operating at a process weight rate of 1,300 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

In order to comply with this limit, the dust collectors shall be in operation at all times the metal milling lines are in operation

**State Rule Applicability - Two (2) Parts Washing Stations (PW1 and PW2)**

326 IAC 8-3-2 (Cold Cleaning Operations)

Any degreaser using VOC containing solvents is considered a cold cleaning operation. The degreasers at this source, which use VOC containing solvents, were constructed after January 1, 1980 and are subject to 326 IAC 8-3-2. Pursuant to 326 IAC 8-3-2, the owner or operator of the cold cleaning operations shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The degreasers, which use VOC containing solvents, were constructed after July 1, 1990 and do not have remote solvent reservoirs, therefore, these degreasers are subject to 326 IAC 8-3-5 and have the following requirements:

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));

(B) the solvent is agitated; or

(C) the solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater that four and three-tenths (4.3) kiloPascals (thirty-two (32 millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kilo Pascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5 (b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**State Rule Applicability - 0.2 MMBtu/hr Space Heater and Wet Milling Operations**

There are no specifically applicable requirements for these units.

**Proposed Changes**

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary metal automotive parts manufacturing facility.

| | |
|---|---|
| Authorized Individual: | ~~Robert Guillaume~~ **President** |
| Source Address: | 10455 State Road 37, Tell City, ~~IN~~ **Indiana** 47586 |
| Mailing Address: | 10455 State Road 37, Tell City, ~~IN~~ **Indiana** 47586 |
| **General Source** Phone Number: | (812) 547-5060 |
| SIC Code: | 3714 |
| County Location: | Perry |
| **Source Location** ~~County~~ Status: | Attainment for all criteria pollutants |
| Source Status: | Minor Source Operating Permit<br>Minor Source, under PSD<br>**Major Source, Section 112 of the Clean Air Act**<br>**Not 1 of 28 Source Categories** |

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

(a) Sixteen (16) ~~cast~~ metal **dry** milling lines**, identified as DR-1 through DR-5, DR-7, DI-F1 through DI-F8, DI-R1, and DI-R2,** each with a maximum capacity of 1,300 pounds per hour. Each of the cast metal milling lines are controlled by a dust collector. Each dust collector has an efficiency of ninety-nine (99%) percent. ~~The dust collectors are identified as EU 1 to EU 16.~~

**(b) Five (5) metal dry milling lines, identified as DR-0, DR-6, DI-F0, DI-F9, and DI-F10, each with a maximum capacity of 1,300 pounds of parts per hour, each equipped with a dust collector for control.**

(~~b~~**c**) One (1) automated ~~airless spray~~ painting line**, identified as PL1, constructed in 2001 and modified in 2002, using conventional air atomizing spray application,** consisting of an aqueous wash step, an automated spray painting enclosure, a natural gas-fired drying oven with a maximum heat input of 0.8 million Btu per hour, and a final forced-draft cooling step. ~~The~~ **This** ~~automated airless~~ spray painting line has a maximum capacity of ~~5,400 pounds of milled metal automotive~~ **72 units of** parts **per hour** and ~~19 pounds per hour of paint~~ **0.095 gallons of paint per unit, and vents through stack S18**.

**(d) Two (2) automated painting lines, identified as PL2 and PL3, using conventional air atomizing spray application, each with a maximum process rate of 72 parts per hour and a maximum paint usage of 0.095 gallons per unit, each equipped with a 0.8 MMBtu/hr natural gas-fired oven, using water curtain as control, venting through stacks S19 and S20, respectively.**

**(e) One (1) touch-up spray booth, identified as TUPB, with a maximum process rate of 54.1 parts per hour and a maximum paint usage of 0.0032 gallons per unit.**

**(f) Two (2) parts washing stations, identified as PW1 and PW2, each with a maximum solvent usage of 36.5 gallons per year.**

(~~c~~**g**) Three (3) natural gas-fired furnaces for building heat, each with a maximum heat input capacity of 0.4 million Btu per hour.

(~~d~~**h**) One (1) natural gas-fired furnace for building heat, with a maximum heat input capacity of 0.25 million Btu per hour.

(~~e~~**i**) Two (2) natural gas-fired space heaters with a maximum heat input capacity of 0.15 million Btu per hour.

(~~f~~**j**) One (1) natural gas-fired space heat with a maximum heat input capacity of 0.2 million Btu per hour.

**(k) One (1) natural gas-fired space heater, with a maximum heat capacity of 0.2 MMBtu/hr.**

**(l) Metal wet milling operations, where an aqueous cutting coolant continuously floods the machining interface.**

B.6 Minor Source Operating Permit [326 IAC 2-6.1]

(e) ~~Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.~~ **Pursuant to 326 IAC 2-7-4(a)(1)(A)(ii) and 325 IAC 2-5.1-4, the Permittee shall apply for a Part 70 operating permit within twelve (12) months of the date on which the source first meets an applicability criterion of 326 IAC 2-7-2.**

**SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS**

**Facility Description [326 IAC 2-6.1]**

(a) Sixteen (16) ~~cast~~ metal **dry** milling lines**, identified as DR-1 through DR-5, DR-7, DI-F1 through DI-F8, DI-R1, and DI-R2,** each with a maximum capacity of 1,300 pounds per hour. Each of the cast metal milling lines are controlled by a dust collector. Each dust collector has an efficiency of ninety-nine (99%) percent. ~~The dust collectors are identified as EU 1 to EU 16.~~

**(b) Five (5) metal dry milling lines, identified as DR-0, DR-6, DI-F0, DI-F9, and DI-F10, each with a maximum capacity of 1,300 pounds of parts per hour, each equipped with a dust collector for control.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards**

D.1.1 Particulate ~~Matter (PM)~~ [326 IAC 6-3**-2**]

Pursuant to 326 IAC 6-3**-2** (~~Process Operations~~ **Manufacturing Processes**), the allowable ~~PM~~ **particulate** emission rate from **each of** the ~~cast metal~~ milling lines shall not exceed 3.1 pounds per hour when operating at a process weight rate of 1,300 pounds per hour.

D.1.3 Particulate ~~Matter (PM)~~ **Control**

The dust collectors for PM control shall be in operation at all times when the ~~cast metal~~ milling lines are in operation.

**SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS**

**Facility Description [326 IAC 2-6.1]**

(~~b~~**c**) One (1) automated ~~airless spray~~ painting line**, identified as PL1, constructed in 2001 and modified in 2002, using conventional air atomizing spray application,** consisting of an aqueous wash step, an automated spray painting enclosure, a natural gas-fired drying oven with a maximum heat input of 0.8 million Btu per hour, and a final forced-draft cooling step. ~~The~~ **This** ~~automated airless~~ spray painting line has a maximum capacity of ~~5,400 pounds of milled metal automotive~~ **72 units of** parts **per hour** and ~~19 pounds per hour of paint~~ **0.095 gallons of paint per unit, and vents through stack S18**.

**(d) Two (2) automated painting lines, identified as PL2 and PL3, using conventional air atomizing spray application, each with a maximum process rate of 72 parts per hour and a maximum paint usage of 0.095 gallons per unit, each equipped with a 0.8 MMBtu/hr natural gas-fired oven, using water curtain as control, venting through stacks S19 and S20, respectively.**

**(e) One (1) touch-up spray booth, identified as TUPB, with a maximum process rate of 54.1 parts per hour and a maximum paint usage of 0.0032 gallons per unit.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards**

~~D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]~~

~~The PM from the automated airless spray painting line shall not exceed the pound per hour emission rate established as E in the following formula:~~

~~Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:~~

~~$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and~~
~~P = process weight rate in tons per hour~~

~~D.2.2 Volatile Organic Compounds (VOCs) [326 IAC 8-2-9]~~

~~Actual emissions before add-on control of VOC from the automated airless spray painting line are less than 15 pounds per day. Therefore, 326 IAC 8-2-9 will not apply. Any change or modification which may increase the actual emissions before add-on control to 15 pounds per day or more of volatile organic compounds must be approved by the Office of Air Quality before any such change may occur.~~

~~D.2.3 Hazardous Air Pollutants (HAPs) [326 IAC 1-6-3]~~

~~Potential to emit of HAPs from the automated airless spray painting line are less than 10 tons per year of any single HAP and less than 25 tons per year of a combination of HAPs. Any change or modification which may increase the potential emissions of a single HAP to greater than 10 tons per year or a combination of HAPs to greater than 25 tons per year must be approved by OAQ before such change may occur.~~

**D.2.1 New Source Toxics Control [326 IAC 2-4.1-1]**

**Pursuant to 326 IAC 2-4.1-1 (MACT):**

**(a) The amount of any single HAP delivered to each of the painting lines (PL1, PL2, and PL3) plus the amount of any single HAP used for clean-up for each line shall not exceed 10.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.**

**(b) The amount of any combination of HAPs delivered to each of the painting lines (PL1, PL2, and PL3) plus the amount of any combination of HAPs used for clean-up for each line shall not exceed 25.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.**

**Therefore, the requirements of 326 IAC 2-4.1-1 (MACT) are not applicable to these painting lines.**

**D.2.2 Volatile Organic Compounds [326 IAC 8-2-9]**

**(a) For each of the painting lines PL1, PL2, and PL3:**

**(1) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of three and five tenths (3.5) that applies extreme performance coatings pounds of VOC per gallon of coating excluding water, delivered to a coating applicator.**

**(2) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.**

**(b) Actual VOC emissions before add-on control from the touch-up spray booth (TUPB) are less than 15 pounds per day. Therefore, 326 IAC 8-2-9 will not apply to this touch-up spray booth. Any change or modification which may increase the actual emissions before add-on control to 15 pounds per day or more of volatile organic compounds must be approved by the Office of Air Quality before any such change may occur.**

**D.2.3 Particulate [326 IAC 6-3-2 (d)][326 IAC 2-2]**

**(a) Particulate from the painting lines PL1, PL2, and PL3 shall be controlled by water curtains, and the Permittee shall operate the control device in accordance with manufacturer's specifications.**

**(b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:**

**(1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.**

**(2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.**

**(c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in**

**operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.**

**The use of water curtains with the painting lines effectively limits the PM emissions from the entire source to less than 250 tons/yr. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.**

D.2.5 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test ~~this~~ **these** emission~~s~~ unit**s** by this permit. However, IDEM may require compliance testing when necessary to determine if the**se** emission~~s~~ unit**s** ~~is~~ **are** in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

~~D.2.6 Particulate Matter (PM)~~

~~The water curtain for PM control shall be in operation at all times when the automated airless spray painting line is in operation.~~

**D.2.6 Hazardous Air Pollutants (HAP) and Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]**

**Compliance with the HAP usage limitations in D.2.1 and the VOC content limitations in Conditions D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAPs data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.**

D.2.8 Record Keeping Requirements

(a) To document compliance with Condition ~~D.2.6 and~~ D.2.7, the Permittee shall maintain a log of weekly overspray observations, weekly observations of the water level in the pans, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(b) To document compliance with Conditions **D.2.1 and** D.2.2 ~~and D.2.3~~, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP emission limits established in Conditions **D.2.1 and** D.2.2 ~~and D.2.3~~.

**D.2.9 Reporting Requirements**

**A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter period being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

**SECTION D.3 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-6.1]:**

**(f) Two (2) parts washing stations, identified as PW1 and PW2, each with a maximum solvent usage of 36.5 gallons per year.**

**(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)**

**Emission Limitations and Standards [326 IAC 2-6.1]**

**D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]**

**Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:**

**(a) Equip the cleaner with a cover;**

**(b) Equip the cleaner with a facility for draining cleaned parts;**

**(c) Close the degreaser cover whenever parts are not being handled in the cleaner;**

**(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;**

**(e) Provide a permanent, conspicuous label summarizing the operation requirements; and**

**(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.**

**D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]**

**(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), or cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:**

**(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:**

**(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38$^{O}$C) (one hundred degrees Fahrenheit (100$^{O}$F));**

**(B) The solvent is agitated; or**

**(C) The solvent is heated.**

**(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38$^{O}$C) (one hundred degrees Fahrenheit (100$^{O}$F)), then the drainage facility must be internal such that**

**articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.**

**(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).**

**(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.**

**(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38$^{O}$C) (one hundred degrees Fahrenheit (100$^{O}$F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9$^{O}$C) (one hundred twenty degrees Fahrenheit (120$^{O}$F)):**

**(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.**

**(B) A water cover when solvent is used is insoluble in, and heavier than, water.**

**(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.**

**(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:**

**(1) Close the cover whenever articles are not being handled in the degreaser.**

**(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.**

**(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.**

**SECTION D.~~3~~4 EMISSIONS UNIT OPERATION CONDITIONS**

**Facility Description [326 IAC 2-6.1]**

(~~e~~**g**) Three (3) natural gas-fired furnaces for building heat, each with a maximum heat input capacity of 0.4 million Btu per hour.

(~~d~~**h**) One (1) natural gas-fired furnace for building heat, with a maximum heat input capacity of 0.25 million Btu per hour.

(~~e~~**i**) Two (2) natural gas-fired space heaters with a maximum heat input capacity of 0.15 million Btu per hour.

(~~f~~**j**) One (1) natural gas-fired space heat with a maximum heat input capacity of 0.2 million Btu per hour.

**(k) One (1) natural gas-fired space heater, with a maximum heat capacity of 0.2 MMBtu/hr.**

**(l) Metal wet milling operations, where an aqueous cutting coolant continuously floods the machining interface.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY
# COMPLIANCE DATA SECTION

## MSOP Quarterly Report

**Source Name:** ATTC Manufacturing, Inc.
**Source Address:** 10455 State Road 37, Tell City, Indiana 47586
**Mailing Address:** 10455 State Road 37, Tell City, Indiana 47586
**SPR No.:** 123-16598-00023
**Facility:** Painting Line PL1
**Parameter:** A single HAP usage
**Limit:** Less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month

**YEAR:** _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---|---|---|---|
| | This Month | Previous 11 Months | 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

**9** No deviation occurred in this quarter.

**9** Deviation/s occurred in this quarter.
Deviation has been reported on: _____

**Submitted by:** _____
**Title / Position:** _____
**Signature:** _____
**Date:** _____
**Phone:** _____

**Attach a signed certification to complete this report.**

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY
# COMPLIANCE DATA SECTION

## MSOP Quarterly Report

**Source Name:** ATTC Manufacturing, Inc.
**Source Address:** 10455 State Road 37, Tell City, Indiana 47586
**Mailing Address:** 10455 State Road 37, Tell City, Indiana 47586
**SPR No.:** 123-16598-00023
**Facility:** Painting Line PL1
**Parameter:** Total HAP usage
**Limit:** Less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month

**YEAR:** _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---|---|---|---|
| | This Month | Previous 11 Months | 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

**9** No deviation occurred in this quarter.

**9** Deviation/s occurred in this quarter.
Deviation has been reported on: _____

**Submitted by:** _____
**Title / Position:** _____
**Signature:** _____
**Date:** _____
**Phone:** _____

**Attach a signed certification to complete this report.**

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY
# COMPLIANCE DATA SECTION

## MSOP Quarterly Report

**Source Name:** ATTC Manufacturing, Inc.
**Source Address:** 10455 State Road 37, Tell City, Indiana 47586
**Mailing Address:** 10455 State Road 37, Tell City, Indiana 47586
**SPR No.:** 123-16598-00023
**Facility:** Painting Line PL2
**Parameter:** A single HAP usage
**Limit:** Less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month

**YEAR:** _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---|---|---|---|
| | This Month | Previous 11 Months | 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

**9** No deviation occurred in this quarter.

**9** Deviation/s occurred in this quarter.
Deviation has been reported on: _____

**Submitted by:** _____
**Title / Position:** _____
**Signature:** _____
**Date:** _____
**Phone:** _____

**Attach a signed certification to complete this report.**

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY
# COMPLIANCE DATA SECTION

## MSOP Quarterly Report

**Source Name:** ATTC Manufacturing, Inc.
**Source Address:** 10455 State Road 37, Tell City, Indiana 47586
**Mailing Address:** 10455 State Road 37, Tell City, Indiana 47586
**SPR No.:** 123-16598-00023
**Facility:** Painting Line PL2
**Parameter:** Total HAP usage
**Limit:** Less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month

**YEAR:** _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---|---|---|---|
| | This Month | Previous 11 Months | 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

**9** No deviation occurred in this quarter.

**9** Deviation/s occurred in this quarter.
Deviation has been reported on: _____

**Submitted by:** _____
**Title / Position:** _____
**Signature:** _____
**Date:** _____
**Phone:** _____

**Attach a signed certification to complete this report.**

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY
# COMPLIANCE DATA SECTION

## MSOP Quarterly Report

**Source Name:** ATTC Manufacturing, Inc.
**Source Address:** 10455 State Road 37, Tell City, Indiana 47586
**Mailing Address:** 10455 State Road 37, Tell City, Indiana 47586
**SPR No.:** 123-16598-00023
**Facility:** Painting Line PL3
**Parameter:** A single HAP usage
**Limit:** Less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month

**YEAR:** _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---|---|---|---|
| | This Month | Previous 11 Months | 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

**9** No deviation occurred in this quarter.

**9** Deviation/s occurred in this quarter.
Deviation has been reported on: _____

**Submitted by:** _____
**Title / Position:** _____
**Signature:** _____
**Date:** _____
**Phone:** _____

**Attach a signed certification to complete this report.**

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY
# COMPLIANCE DATA SECTION

## MSOP Quarterly Report

**Source Name:** ATTC Manufacturing, Inc.
**Source Address:** 10455 State Road 37, Tell City, Indiana 47586
**Mailing Address:** 10455 State Road 37, Tell City, Indiana 47586
**SPR No.:** 123-16598-00023
**Facility:** Painting Line PL3
**Parameter:** Total HAP usage
**Limit:** Less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month

**YEAR:** _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---|---|---|---|
| | This Month | Previous 11 Months | 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

**9** No deviation occurred in this quarter.

**9** Deviation/s occurred in this quarter.
Deviation has been reported on: _____

**Submitted by:** _____
**Title / Position:** _____
**Signature:** _____
**Date:** _____
**Phone:** _____

**Attach a signed certification to complete this report.**

**Conclusion**

The construction of this proposed modification shall be subject to the conditions of the attached proposed MSOP Significant Permit Revision 123-16598-00023.

**Appendix A: Emission Calculations**
**VOC and PM/PM10 Emissions**
**From Paint Lines PL1, PL2, and PL3**

**Company Name: ATTC Manufacturing, Inc.**
**Address : 10455 State Road 37, Tell City, IN 47586**
**SPR: 123-16598-00023**
**Reviewer: ERG/YC**
**Date: March 3, 2003**

| Coatings | Unit ID | Density (Lb/Gal) | Weight % Volatile ($H_2O$ & Organics) | Weight % Water | Weight % Organics | Maximum Throughput (unit/hr) | Maximum Usage (gal/unit) | Pounds VOC per gallon of coating | Potential VOC (lbs/hr) | Potential VOC (lbs/day) | Potential VOC (tons/yr) | *PM/PM10 Potential (lb/hr) | *PM/PM10 Potential (ton/yr) | ***Transfer Efficiency | **PM/PM10 Control Efficiency | Potential to Emit PM/PM10 (lb/hr) | Potential to Emit PM/PM10 (tons/yr) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 96157 Black | PL1 | 8.91 | 53.61% | 30.21% | 23.4% | 72.0 | 0.095 | 2.08 | 14.26 | 342.26 | 62.46 | 19.79 | 86.68 | 30% | 94% | 1.19 | 5.20 |
| 96157 Black | PL2 | 8.91 | 53.61% | 30.21% | 23.4% | 72.0 | 0.095 | 2.08 | 14.26 | 342.26 | 62.46 | 19.79 | 86.68 | 30% | 94% | 1.19 | 5.20 |
| 96157 Black | PL3 | 8.91 | 53.61% | 30.21% | 23.4% | 72.0 | 0.095 | 2.08 | 14.26 | 342.26 | 62.46 | 19.79 | 86.68 | 30% | 94% | 1.19 | 5.20 |
| **Total** | | | | | | | | | | | **187.39** | | **260.05** | | | | **15.60** |

*Assume all the PM emissions are PM10 emissions.

** Particulate emissions are controlled by water curtains and the control efficiency is provided by the source.

*** These painting lines use air atomizing spray guns and the transfer efficiency is provided by the source.

**METHODOLOGY**

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit)
Potential VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (24 hr/day)
Potential VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (8760 hr/yr) * (1 ton/2000 lbs)
Potential PM/PM10 (lbs/hr) = Max. Throughput (unit/hr) * Max. Usage (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency)
Potential PM/PM10 (tons/yr) = Max. Throughput (unit/hr) * Max. Usage (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency) * (8760 hrs/yr) *(1 ton/2000 lbs)
Potential to Emit PM/PM10 (lbs/hr) = Potential PM/PM10 (lbs/hr) * (1 - PM/PM10 Control Efficiency)
Potential to Emit PM/PM10 (tons/yr) = Potential PM/PM10 (lbs/hr) * (1 - PM/PM10 Control Efficiency) * (8760 hr/yr) x (1 ton/2000 lbs)

**Appendix A: Emission Calculations**
**HAP Emissions**
**From Paint Lines PL1, PL2, and PL3**

**Company Name: ATTC Manufacturing, Inc.**
**Address : 10455 State Road 37, Tell City, IN 47586**
**SPR: 123-16598-00023**
**Reviewer: ERG/YC**
**Date: March 3, 2003**

| Coatings | Unit ID | Density (lb/gal) | Maximum Throughput (unit/hr) | Maximum Usage (gal/unit) | Weight % Glycol Ether | Glycol Ether Emissions (tons/yr) |
|---|---|---|---|---|---|---|
| 96157 Black | PL1 | 8.91 | 72.0 | 0.095 | 16.20% | 43.24 |
| 96157 Black | PL2 | 8.91 | 72.0 | 0.095 | 16.20% | 43.24 |
| 96157 Black | PL3 | 8.91 | 72.0 | 0.095 | 16.20% | 43.24 |
| **Total** | | | | | | **129.73** |

**Total HAPs** **129.73 tons/yr**

**METHODOLOGY**
HAPs emission rate (tons/yr) = Density (lb/gal) x Max. Throughput (unit/hr) * Max. Usage (gal/unit) x Weight % HAP x 8760 hr/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations**
**Natural Gas Combustion**
**(MMBtu/hr < 100)**
**From each 0.8 MMBtu/hr Oven with the Painting Line**

**Company Name: ATTC Manufacturing, Inc.**
**Address : 10455 State Road 37, Tell City, IN 47586**
**SPR: 123-16598-00023**
**Reviewer: ERG/YC**
**Date: March 3, 2003**

| Heat Input Capacity MMBtu/hr | Potential Throughput MMCF/yr |
|---|---|
| 0.80 | 7.0 |

Pollutant

| | PM* | PM10* | $SO_2$ | **$NO_x$ | VOC | CO |
|---|---|---|---|---|---|---|
| Emission Factor in lb/MMCF | 7.6 | 7.6 | 0.6 | 100 | 5.5 | 84.0 |
| **Potential Emission in tons/yr** | **0.03** | **0.03** | **2.1E-03** | **0.35** | **0.02** | **0.29** |

*PM and PM10 emission factors are condensable and filterable PM10 combined.
**Emission Factors for $NO_x$: Uncontrolled = 100, Low $NO_x$ Burner = 50, Low $NO_x$ Burners/Flue gas recirculation = 32

**Methodology**

All Emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF - 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Appendix A: Emission Calculations**
**VOC and PM/PM10 Emissions**
**From the Touch-Up Paint Booth (TUPB)**

**Company Name: ATTC Manufacturing, Inc.**
**Address : 10455 State Road 37, Tell City, IN 47586**
**SPR: 123-16598-00023**
**Reviewer: ERG/YC**
**Date: March 3, 2003**

| Material | Density (lb/gal) | Weight % Volatile ($H_2O$ & Organics) | Weight % Water | Weight % Organics | Maximum Throughput (unit/hr) | Maximum Usage (gal/unit) | Pounds VOC per gallon of coating | Potential VOC (lbs/hr) | Potential VOC (lbs/day) | Potential VOC (tons/yr) | *PM/PM10 Potential (lb/hr) | *PM/PM10 Potential (ton/yr) | Transfer Efficiency |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| W44231-Autoprime | 11.4 | 45.02% | 43.1% | 1.9% | 51.4 | 0.0032 | 0.22 | 0.04 | 0.86 | 0.16 | 0.72 | 3.16 | 30% |
| **Total** | | | | | | | | **0.04** | | **0.16** | **0.72** | **3.16** | |

*Assume all the PM emissions are PM10 emissions.

**METHODOLOGY**

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit)
Potential VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (24 hr/day)
Potential VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (8760 hr/yr) * (1 ton/2000 lbs)
Potential PM/PM10 (lbs/hr) = Max. Throughput (unit/hr) * Max. Usage (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency)
Potential PM/PM10 (tons/yr) = Max. Throughput (unit/hr) * Max. Usage (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency) * (8760 hrs/yr) *(1 ton/2000

) lbs)

**Appendix A: Emission Calculations**
**HAP Emissions**
**From the Touch-Up Paint Booth (TUPB)**

**Company Name: ATTC Manufacturing, Inc.**
**Address : 10455 State Road 37, Tell City, IN 47586**
**SPR: 123-16598-00023**
**Reviewer: ERG/YC**
**Date: March 3, 2003**

| Material | Density (lb/gal) | Maximum Throughput (unit/hr) | Maximum Usage (gal/unit) | Weight % Glycol Ethers | Glycol Ethers Emissions (tons/yr) |
|---|---|---|---|---|---|
| W44231-Autoprime | 11.4 | 51.4 | 0.0032 | 1.76% | 0.14 |
| **Total** | | | | | **0.14** |

**Total HAPs** **0.14 tons/yr**

**METHODOLOGY**
HAPs emission rate (tons/yr) = Density (lb/gal) x Max. Throughput (unit/hr) * Max. Usage (gal/unit) x Weight % HAP x 8760 hr/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations**
**PM/PM10 Emissions**
**From Five (5) Metal Milling Lines**

**Company Name: ATTC Manufacturing, Inc.**
**Address : 10455 State Road 37, Tell City, IN 47586**
**SPR: 123-16598-00023**
**Reviewer: ERG/YC**
**Date: March 3, 2003**

**1. Process Description:**

| | | |
|---|---|---|
| Number of Lines: | 5 | |
| Maximum Total Throughput: | 1,300 | lb/hr/line |
| Control Device: | Dust Collectors | |
| Potential to Emit PM before Control: | 0.16 | lbs/hr/line (from MSOP #123-14584-00023, issued November 6, 2001) |
| Control Efficiency: | 99% | |

**2. Potential to Emit PM/PM10 before Control:**

Assume all the PM emissions are PM10 emissions.

**Annual PM/PM10 emissions** = 0.16 lbs/hr/line x 8760 hr/yr x 1/2000 (ton/lb) x 5 lines = **3.47 tons/yr**

**3. Potential to Emit PM/PM10 with Control:**

**Annual PM/PM10 emissions** = 0.16 lbs/hr/line x 8760 hr/yr x 1/2000 (ton/lb) x 5 lines x (1-99%) = **0.03 tons/yr**

**Appendix A: Emission Calculations**
**VOC and HAP Emissions**
**From the Two (2) Washing Stations (PW1 and PW2)**

**Company Name: ATTC Manufacturing, Inc.**
**Address : 10455 State Road 37, Tell City, IN 47586**
**SPR: 123-16598-00023**
**Reviewer: ERG/YC**
**Date: March 3, 2003**

| Unit ID | Solvent | Density (lb/gal) | Weight % VOC | Maximum Consumption (gal/day) | Potential to Emit VOC (tons/yr) |
|---|---|---|---|---|---|
| PW1 | Lacquer Thinner 6782 | 6.9 | 100.0% | 0.10 | 0.13 |
| PW2 | Mineral Spirits | 6.8 | 100.0% | 0.10 | 0.12 |
| **Total** | | | | | **0.25** |

**METHODOLOGY**

Potential VOC (tons/yr) = Density (lbs/gal) * Weight % VOC * Maximum Consumption (gal/day) * 365 days/yr * (1 ton/2000 lbs)

**Appendix A: Emission Calculations**
**Natural Gas Combustion**
**(MMBtu/hr < 100)**
**From One (1) 0.2 MMBtu/hr Gas Heater**

**Company Name: ATTC Manufacturing, Inc.**
**Address : 10455 State Road 37, Tell City, IN 47586**
**SPR: 123-16598-00023**
**Reviewer: ERG/YC**
**Date: March 3, 2003**

| Heat Input Capacity MMBtu/hr | Potential Throughput MMCF/yr |
|---|---|
| 0.20 | 1.8 |

Pollutant

| | PM* | PM10* | $SO_2$ | **$NO_x$ | VOC | CO |
|---|---|---|---|---|---|---|
| Emission Factor in lb/MMCF | 7.6 | 7.6 | 0.6 | 100 | 5.5 | 84.0 |
| **Potential Emission in tons/yr** | **0.01** | **0.01** | **5.3E-04** | **0.09** | **4.82E-03** | **0.07** |

*PM and PM10 emission factors are condensable and filterable PM10 combined.

**Emission Factors for $NO_x$: Uncontrolled = 100, Low $NO_x$ Burner = 50, Low $NO_x$ Burners/Flue gas recirculation = 32

**Methodology**

All Emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF - 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton